

**FELICELLO**

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October 8, 2024

VIA ECF

Hon. Valerie Figueredo  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**MEMO ENDORSED**

  
HON. VALERIE FIGUEREDO  
UNITED STATES MAGISTRATE JUDGE

Dated: 10/9/24

The motion to seal is GRANTED. The Clerk of Court is directed to permanently seal the declaration filed at ECF No. 84.

The Clerk of Court is respectfully directed to terminate the motion at ECF No. 82.

Re: *China AI Capital Limited v. DLA Piper LLP (US) et al.*, Case No. 1:21-cv-10911 (S.D.N.Y.)

Dear Judge Figueredo:

In accordance with Section I.g.2 of this Court's Individual Practices in Civil Cases and the Southern District of New York's ECF Rules & Instructions, Section 6, Plaintiff China AI Capital Ltd. ("Plaintiff") respectfully requests that the Court grant leave to file under seal an unredacted copy of my declaration dated October 8, 2024 (the "Maloney Decl."). A redacted version of the Maloney Decl. has been filed publicly with Plaintiff's opposition to the fee application by Defendants DLA Piper LLP (US) and Caryn Schechtman (together, the "Defendants").

The basis for this request is that in order to respond to Defendants' September 3, 2024 fee application, my declaration refers to and recites extracts of the sealed time entries originally filed under seal at ECF No. 80-4 as Exhibit D ("Exhibit D") to the Declaration of Nancy Hart dated September 3, 2024 (ECF No. 79). By letter motion dated September 3, 2024, Defendants requested that the time entry information in Exhibit D be filed under seal on the ground of attorney-client privilege and work product. *See* ECF No. 77. The Court granted the request to seal on September 5, 2024, before Plaintiff could respond. ECF No. 81.

Accordingly, without conceding the grounds asserted by Defendants for sealing, Plaintiff respectfully requests leave to file my declaration under seal.

Sincerely,

/s/ Michael James Maloney

Michael James Maloney

cc: All counsel of record by ECF